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June 18, 2018

Hon. Susan D. Wigenton, U.S.D.J.
United State District Court - District of New Jersey
50 Walnut Street
Newark, NJ 07201

Re: **Strike 3 Holdings, LLC, Joseph Adona**
Case No. 2:18-cv-00922 (SDW-LDW)
Plaintiff's Request to Enter Default

Dear Judge Wigenton:

I am local counsel for the defendant in the above reference case and submit this letter in opposition to plaintiff's Request to Enter Default filed on June 13, 2018 (ECF No. 14). Although plaintiff's counsel certified that defendant had not yet responded to the First Amended Complaint and has not sought an extension of the response deadline, my co-counsel (yet to be admitted as pro hac vice in this case) has since been seeking an extension of time to respond to the Complaint. *See* Email correspondence dated June 15, 2018, and June 18, 2018, a true copy of which is attached hereto as "Exhibit A." No response has been received from plaintiff's counsel as of yet.

Therefore, we respectfully request that the Court deny plaintiff's Request to Enter Default.

Respectfully submitted,

By: /s/ Leslie A. Farber
Leslie A. Farber

LAF:beg

Encl.

cc: John C. Atkin, Esq. (*via ECF*)